## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

JESSICA CHEATHAM,	§	
	§	
Plaintiff,	§	
	§	
v.	<b>§</b>	Case. No. 4:20-cv-02193
	<b>§</b>	
SCHLUMBERGER TECHNOLOGY	<b>§</b>	
CORPORATION,	<b>§</b>	
	<b>§</b>	
Defendant.	§	
	§	
	§	

## DECLARATION OF MICHAEL PALMER IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION IN LIMINE TO EXCLUDE THE EXPERT TESTIMONY OF NORA OSTROFE

- I, Michael Palmer, hereby declare as follows:
- 1. I make this declaration in support of Plaintiff Jessica Cheatham's Opposition to Defendant's Motion *In Limine* to Exclude the Expert Testimony of Nora Ostrofe.
- 2. I am an attorney admitted to practice law in the State of New York. I have been admitted in this case *pro hac vice*.
- 3. Attached as **Exhibit A** is a true and correct copy of the Expert Report of Philip J. Cross, Ph.D., filed under seal.
- 4. Attached as **Exhibit B** is a true and correct copy of excerpts of the transcript of Dr. Philip J. Cross's deposition testimony, taken on January 11, 2023, with a copy of the deposition errata included at the end of the exhibit.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Dated: February 8, 2023 /s/ Michael Palmer
Michael Palmer

## **CERTIFICATE OF SERVICE**

I hereby certify that on February 8, 2023, a true and correct copy of the foregoing was served upon counsel of record via ECF.

/s/ Michael Palmer
Michael Palmer